

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK----- X  
THE MANAGEMENT GROUP, LLC, ANDREW  
FOX, and LEE HEIMAN,

Plaintiffs,

- against -

ANGEL MUSIC GROUP LTD., NEIL MOFFITT,  
NICK McCABE, JESSIE ANGLES, ANU DHAMI,  
ISABEL PIAGGI, and DAN A. VIDAL,Defendants.  
----- X

08-02172(PKC)

**NOTICE OF MOTION TO  
ADMIT COUNSEL  
PRO HAC VICE**

PLEASE TAKE NOTICE that, upon the annexed Affidavit of Michael Liberman, Esq., Declaration of Ronald Richards, Esq., and the Certificate of Good Standing for Ronald Richards, Esq.. attached as Exhibits A thereto, Defendant Neil Moffitt, by his attorneys Epstein Becker & Green, P.C., will move this Court, before the Honorable P. Kevin Castel, United States District Judge, at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the admission of Ronald Richards, Esq., a member of the Law Firm Ronald Richards and Associates, and a member in good standing of the Bar of the State of California, as attorney pro hac vice for Defendant Neil Moffitt in the above-captioned matter.

FILED  
MAR 10 11:39  
C.D. OF N.Y.

644140 \$25 3-10-08 MG

Dated: New York, New York  
March 10, 2008

EPSTEIN BECKER & GREEN, P.C.

By: 

Michael Liberman  
250 Park Avenue  
New York, NY 10177-0077  
(212) 351-4500  
Attorneys for Defendants Angel Music  
Group Ltd. and Neil Moffitt

TO: Peter M. Ripin, Esq.  
Davidoff Malito & Hutcher LLP  
605 Third Avenue  
New York, New York 10158  
(212) 557-7200  
Attorney for Plaintiffs

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**AFFIDAVIT IN SUPPORT OF  
ADMISSION PRO HAC VICE**

STATE OF NEW YORK     )  
  ) ss.:  
COUNTY OF NEW YORK    )

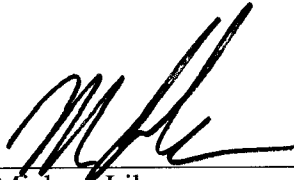
Michael Liberman, being duly sworn, deposes and says:

1. I am an associate of the law firm of Epstein Becker & Green, P.C., located at 250 Park Avenue, New York, New York, counsel to Defendants Neil Moffitt. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of defendant Neil Moffitt's motion to admit Ronald Richards, Esq. as counsel pro hac vice to represent Neil Moffitt in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on March 3, 2003. I am also admitted to the United States District Courts for the Southern and Eastern Districts of New York, and am in good standing with this Court.
3. Ronald Richards is a member of the The Law Firm Ronald Richards and Associates in West Hollywood, California.
4. I have found Mr. Richards to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. An declaration executed by Mr. Richards, which attaches a certificates of his good standing with the bars of the State of California, is submitted herewith.
4. Accordingly, I am pleased to move for the admission of Ronald Richards, pro hac vice.

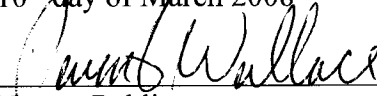
5. I respectfully submit a proposed order granting the admission of Ronald Richards, pro hac vice, which is attached hereto.

WHEREFORE, it is respectfully requested that the motion to admit Ronald Richards, pro hac vice, to represent Defendant Neil Moffitt in the above captioned matter, be granted.

Dated: New York, New York  
March 10, 2007

  
\_\_\_\_\_  
Michael Liberman

Sworn to before me this  
10<sup>th</sup> day of March 2008

  
\_\_\_\_\_  
Notary Public

OWEN G. WALLACE  
Notary Public, State of New York  
No. 02WA6130851  
Qualified in Westchester County  
Certificate Filed in New York County  
Commission Expires July 25, 20 09

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**DECLARATION IN  
SUPPORT OF ADMISSION  
PRO HAC VICE**

I, Ronald Richards, Esq., declare under penalty of perjury:

1. I am Ronald Richards of the Law Firm Ronald Richards and Associates located at 9255 Doheny Rd., Suite 502, West Hollywood, CA 90069 and attorneys for defendant Neil Moffitt. My home mailing address is P.O. Box 11480 Beverly Hills, 90213. I make this declaration in support of my petition to be admitted pro hac vice as counsel to defendant Neil Moffitt in this action.

2. I have been a member in good standing of the California State Bar since 1995. I am admitted to practice before the California Supreme Court, the 9<sup>th</sup> and 11<sup>th</sup> Circuit Court of Appeals, the District of Colorado, the Eastern District of Michigan, and all federal courts in California. My Certificate of Good Standing from the California Supreme Court is attached hereto as Exhibit A.

3. There are no disciplinary proceedings pending against me as a member of the Bar of any jurisdiction, and I have never been censured, suspended or disbarred.

4. I agree to be subject to the orders, disciplinary action and civil jurisdiction of the United States District Court for the Southern District of New York in all respects as if I were a regularly admitted and licensed member of the bar of this Court.

5. I seek to participate in the above matter because of my expertise in the area of entertainment litigation and have become integrally involved with this matter as I have represented the defendants for a long time.

6. I respectfully request that this Court grant the within application for my admission pro hac vice pursuant to Rule 1.3(c) of the Local Civil Rules of Southern and Eastern Districts of New York.

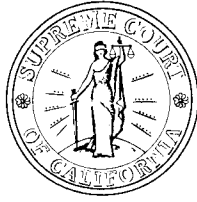
WHEREFORE, I respectfully request that I be admitted pro hac vice for all purposes in this action.



Handwritten signature and date: 2-29-08

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EXHIBIT A



# Supreme Court of California

FREDERICK K. OHLRICH

*Clerk of the Court*

## CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

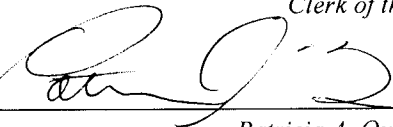
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I, FREDERICK K. OHLRICH, *Clerk of the Supreme Court of the State of California*, do hereby certify that **Ronald N. Richards**, was on the 1<sup>st</sup> of June, 1995, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that his/her name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court,  
this 29<sup>th</sup> day of February, 2008.*

FREDERICK K. OHLRICH

*Clerk of the Supreme Court*

By 

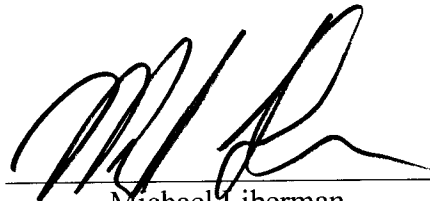
*Patricia A. Quinn, Deputy Clerk*



**CERTIFICATE OF SERVICE**

I, Michael Liberman, an attorney admitted to practice before this court, hereby certify, under penalty of perjury, that on March 10, 2008, I caused a true copy of the attached Notice of Motion to Admit Ronald Richards, Esq. pro hac vice, Affidavit of Michael Liberman, dated March 10, 2008, Declaration of Ronald Richards, Esq, dated February 29, 2008, and the exhibit attached thereto, and Proposed Order, to be served by first class mail upon:

Larry Hutcher  
Davidoff Malito & Hutcher, LLP  
605 Third Avenue  
New York, New York 10158

  
\_\_\_\_\_  
Michael Liberman

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**ORDER GRANTING  
ADMISSION PRO HAC VICE**

Upon the motion of Michael Liberman, attorney for Defendants Angel Music Group Ltd. and Neil Moffitt and said sponsor attorney's affidavit in support:

**IT IS HEREBY ORDERED** that

Ronald Richards, Esq.  
Law Firm of Ronald Richards and Associates  
P.O. Box 11480  
Beverly Hills, CA 90213  
310-556-1001  
[ron@ronaldrichards.com](mailto:ron@ronaldrichards.com)

is admitted to practice pro hac vice as counsel for Defendant Neil Moffitt in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: New York, New York  
\_\_\_\_\_, 2008

\_\_\_\_\_  
Hon. P. Kevin Castel, United States District Judge